

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

This Document Relates to:
ALL ACTIONS

**DECLARATION OF SARAH R. LONDON IN
SUPPORT OF PLAINTIFFS' OPPOSITION
TO DEFENDANTS' MOTION FOR
ENFORCEMENT OF THE PROTECTIVE
ORDER**

Judge: Hon. Lisa J. Cisneros
Courtroom: G - 15th Floor

REDACTED

1 I, Sarah R. London, declare:

2 1. I am an attorney in the law firm of Girard Sharp, LLP, appointed Co-Lead and
3 Liaison Counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of
4 the State Bar of California and am admitted to practice before this Court. I make this declaration
5 based on my own personal knowledge. If called upon to testify, I could and would testify
6 competently to the truth of the matters stated herein.

7 2. I have no knowledge of the identity of any person who transmitted, directly or
8 indirectly, documents or information designated confidential in this litigation to the New York
9 Times.

10 3. I have spoken with my Co-Leads Roopal Luhana and Rachel Abrams. Both
11 informed me that they have no knowledge of the identity of any person who transmitted, directly or
12 indirectly, documents or information designated confidential in this litigation to the New York
13 Times.

14 4. After Uber contacted Co-Lead Counsel with its concerns about the alleged
15 disclosure to the New York Times, my Co-Leads and I asked the members of the Plaintiffs'
16 Steering Committee to report to us any knowledge they had regarding the circumstances of any
17 disclosure of documents or information designated confidential in this litigation to the New York
18 Times.

19 5. No member of the PSC has reported any such knowledge.

20 6. My Co-Leads and I also convened an all-counsel call, during which we asked
21 counsel to report to us any knowledge they had regarding the circumstances of any disclosure of
22 documents or information designated confidential in this litigation to the New York Times.

23 7. No person has reported any such knowledge.

24 8. Attached as **Exhibit A** is a true and correct copy of excerpts of the transcript of the
25 July 31, 2025 hearing in *In re: Uber Rideshare Cases*, JCCP 5188.

26 9. Attached as **Exhibit B** is a true and correct copy of Exhibit 1731 to the July 23,
27 2025, Nilles deposition. This document has been filed under seal.

28 10. My co-counsel reviewed the original document produced by Uber and used as

Exhibit 1731 to the Nilles deposition. [REDACTED]

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27th day of August, 2025 in San Francisco, California.

/s/ Sarah R. London

Sarah R. London